Surrey Waste Local Plan
Examination Hearings – Week 2
26 September 2019 – 10:00

Agenda – Day 6 v2

Please note:
- All participants are encouraged to familiarise themselves with the hearing statements (and any additional evidence) produced by the Council and other parties in respect of the matters addressed at this session. These are available on the examination website.
- Most references to questions refer to those posed by the Inspector in the schedule of Matters, Issues and Questions (already circulated)
- The hearing will run until around 13:00, with a break mid-morning.

Inspector’s opening

Matter 1. (b) Legal Compliance

Issue: Has the DtC been met and does the SWLP meet all other relevant legislative requirements?

Sustainability Appraisal (SA)

11. Has an adequate site assessment process been undertaken? Is there adequate coverage of all reasonable alternatives and have they been similarly evaluated to the preferred option? Have outline reasons been given in the SA for selecting the alternatives dealt with and a description given of how the assessment was undertaken? Have reasons been given for rejecting alternatives?

- Having regard to the Revised Chapter 2 of the Environmental and Sustainability Report (Addendum to SWLP 5), do the results of the appraisal within the SA feed into a clear explanation within the SA of why the policies and allocations in the plan have been selected and alternatives rejected?
- How were the policy options for CD&E recycling assessed?
- Was the site assessment and selection process systematic, robust and consistent?
- Are the assessments made about whether individual sites are suitable, available and deliverable clearly supported by
evidence, including in relation to identified known constraints?

Matter 5: Allocations and ILAS (continued) (Policies 10, 11a, 11b, 12)

Issue: Whether the Industrial Land Areas of Search (ILAS) and the allocations are soundly based and provide sufficient flexibility to meet the identified needs of the area for the management of waste?

Policy 11b – Allocation of a Site for a Household Waste Materials Recycling Facility (Part 2 Allocation 5.6)

113. Would the proposed allocation meet the identified need for specific additional capacity for DMR? Taking into account the proposed allocations in Policy 11a, does the evidence demonstrate that the proposed Policy 11b allocation is necessary to meet that need?

- The SWLP, Part 2 Section 5.6, identifies the site as suitable for a small size facility (up to 50,000 tpa), but potentially suitable for a medium size facility of up to 120,000 tpa with improvements to the highway network. The explanatory text to Policy 11b, in paragraph 5.3.4.10, identifies the site as a suitable and deliverable location to develop an MRF to deal with approximately 120,000 tonnes per annum of DMR. For effectiveness, should paragraph 5.3.4.10 make reference to the identified mitigation required to the highway network to enable the delivery of a medium size facility?

- Would a small sized facility meet the identified need for specific additional capacity for DMR?

- What improvements to the highway network are likely to be required to enable the delivery of a medium sized facility?

114. The site is not previously developed land (PDL), is within the Green Belt, and contains areas of ancient woodland. Does the evidence demonstrate that the allocation of the site is justified and would be preferable to reasonable alternative allocations when considered in relation to the locational hierarchy of the spatial strategy for waste management facilities?

- To be discussed in relation to Q11, Matter 1.

115. In other respects, in comparison to other reasonable alternative sites, is the proposed site allocation justified, clear and robust, including in relation to the proximity principle, and its location in relation to the Strategic Road Network (SRN)?

- How does the location of the site relative to the existing facility at Leatherhead support the Council’s justification for
the proposed allocation in relation to the proximity principle?

- Does the summary conclusion in section 12 of the Transport Study accurately reflect the conclusion about the suitability of the site in section 7?
- In comparison to reasonable alternatives, is the proposed allocation considered more likely to be deliverable and viable? If so, why?

116. For clarity and effectiveness, should the wording of the policy clearly indicate a requirement for compliance with other policies within the SWLP and include a cross-reference to Policy 9, on development within the Green Belt?

- Would the Council’s proposed modification MM9 to Policy 10 satisfactorily address this issue?
- For effectiveness, should the policy make specific reference to the key constraints identified in Part 2?

117. The evidence indicates that the site is allocated in the current Waste Local Plan 2008. What assessment has been undertaken of why the site has not previously come forward for development? Is the site reasonably likely to be deliverable within the plan period?

- Is there a reasonable likelihood that the site will come forward for development during the plan period?

118. The key development issues for the site, identified within Part 2 of the SWLP, include a number of European sites (Special Protection Areas, Special Areas of Conservation, Ramsar site), a Site of Special Scientific Interest and a local nature reserve. How have the impacts of the proposed allocation on these sites been assessed? Are the findings of this assessment clear and robust? Do they support the allocation of the site?

- In the SA, Part C7.B, p402-403, the SA indicates that, on a precautionary basis, the site would not be appropriate for any waste management development that gives rise to additional HGV traffic. It also indicates that any form of waste related operations would likely result in a net loss of biodiversity interest and value. Having regard to this, would the proposed allocation be justified and consistent with NPPF paragraphs 174 and 175?
- How has the potential impact on ancient woodland been assessed? Does the evidence demonstrate that the proposed development of the site for a medium sized facility would be deliverable and unlikely to result in the loss or deterioration of ancient woodland?
119. How has the proposed allocation considered the potential for cumulative impacts, including in relation to traffic movements and air quality, associated with the proposed development of the waste management facility, together with other development nearby?
   - **Would the proposed allocation be reasonably likely to result in significant impacts on air quality?**

120. How have the potential transport impacts of the proposed allocation been assessed, including cumulative impacts of this proposal and other proposed development nearby? Would the development proposed have a significant adverse impact on the safety and capacity of the local and strategic highway network? What improvements to the highway network would be required to support a small - medium size facility?
   - **Does the evidence base justify the allocation of the site for a medium sized facility?**
   - **How have the cumulative transportation impacts in relation to other development, including the proposed housing allocation within the emerging plan for Runnymede Borough Council, been assessed? (NPPW, Appendix B)**
   - **Is there a reasonable degree of certainty regarding the extent of likely highway mitigation required in relation to the proposed allocation?**
   - **Would this be dependent on the scale of development proposed?**
   - **Would the works likely to be required be viable and feasible in relation to the development proposed?**
   - **To be effective, would it be necessary for Policy 11b to include reference to the need to address the cumulative impact of any development on the local and strategic highway network, mitigate impacts to acceptable levels and, where necessary, to contribute financially to improvements on the A320?**
   - **Should Policy 11b prevent development coming forward before mitigation works on the A320 have been completed?**

121. Is the Council confident that the development of the site would be able to meet the requirements of Policy 14 of the SWLP, including in relation to the potential impacts on areas of ancient woodland, the potential archaeological importance of the site, other aspects of the environment, and local communities? How has this been assessed?
   - **How have the potential impacts of the proposed development of the site on the nearby proposed areas of Suitable Alternative Natural Greenspace (SANG) been assessed? Would the Council’s proposed modification
MM21, to include specific reference to the SANG within the Plan, be necessary for effectiveness?

- To be consistent with national policy, should the policy specify that ‘wholly exceptional reasons’ should exist to justify the loss or deterioration of ancient woodland?
- How have impacts on existing and potential future communities been assessed? Would these impacts be acceptable?
- Does the supporting evidence base, including the document Trumps Farm: Waste Local Plan Supporting Information (ED-03), satisfactorily demonstrate that these requirements would be reasonably likely to be addressed?

122. A number of potential constraints have been identified for the proposed allocation in Part 2 of the SWLP. Is there a reasonable prospect that these constraints are capable of resolution?

- Does the SWLP identify how the potential constraints may be overcome?
- Does the evidence base justify the allocation of the site?

General Matters

Any other matters not covered in previous sessions

Review of Proposed Main Modifications

Any site visit arrangements

End